

Gary M. Hoffman (*Pro Hac Vice*)
Kenneth W. Brothers (*Pro Hac Vice*)
DICKSTEIN SHAPIRO MORIN
& OSHINSKY, LLP
2101 L Street, NW
Washington, DC 20037-1526
Phone (202) 785-9700
Fax (202) 887-0689

Teresa M. Corbin (SBN 132360)
Denise DeMory
HOWREY LLP
525 Market Street
Suite 3600
San Francisco, CA 94105
Phone (415) 848-4900
Attorneys for Defendants and Synopsys, Inc.

Edward A. Meilman (*Pro Hac Vice*)
DICKSTEIN SHAPIRO MORIN
& OSHINSKY, LLP
1177 Avenue of the Americas
New York, New York 10036-2714
Phone (212) 835-1400
Fax (212) 997-9880

Jeffrey B. Demain, State Bar No. 126715
Jonathan Weissglass, State Bar No. 185008
ALTSHULER, BERZON, NUSSBAUM, RUBIN & DEMAIN
177 Post Street, Suite 300
San Francisco, California 94108
Phone (415) 421-7151
Fax (415) 362-8064

Attorneys for Plaintiff Ricoh Company, Ltd.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

SYNOPSYS, INC.,)	CASE NO. C-03-2289-MJJ
Plaintiff,)	CASE NO. C-03-4669-MJJ
v.)	
RICOH COMPANY, LTD.,)	
Defendant.)	
RICOH COMPANY, LTD.,)	STIPULATION AND [PROPOSED] ORDER CONFORMING CERTAIN DATES TO EXISTING SECOND AMENDED PRE- TRIAL SCHEDULE
Plaintiff,)	
v.)	
AEROFLEX INCORPORATED, et al.,)	
Defendants)	

1 1. Ricoh Company, Ltd., Synopsys, Inc., and Defendants Aeroflex, Inc., et al. (collectively
 2 "the Parties"), hereby stipulate to proposed schedule, and request that the Court modify its Second
 3 Amended Pre-trial Order in accordance with the stipulated proposed schedule.

4 2. Based on the progress of this case, the Parties, on November 16, 2005, submitted a Joint
 5 Stipulation and Request to Modify the Second Amended Pre-trial order, which this Court entered on
 6 November 22, 2005. That Stipulation and Proposed Order omitted certain items. This Stipulation and
 7 Order maintains the Trial and Pretrial Conference dates, but includes the omitted dates which are set out
 8 below.

9 3. IT IS HEREBY STIPULATED AND AGREED by and between the Parties that the case
 10 schedule be changed to the following:

Event	Date pursuant to existing order	New date
Close of general fact discovery (responses due by this date)	5/30/2006	5/30/2006
Deadline for additional 30(b)(6) depositions relating to Judge Chen's May 8, 2006 Order		6/9/2006
Settlement Conference with Judge Spero	10/30/2006	6/6/2006 @ 9:30
Last day to file discovery motions re general discovery deadline and non-deposition document discovery provided for in Judge Chen's May 8, 2006 Order	6/7/2006	6/07/2006
Service of proposed stipulations resolving various discovery issues		6/09/2006
Last day to file discovery motions re (1) additional 30(b)(6) depositions, including document-related issues identified at the depositions relating to Judge Chen's May 8, 2006 Order; (2) Ricoh's responses to Matrox Tech's 4/17/06 interrogatories; and (3) any issues relating to the stipulations exchanged on 6/9/06		6/15/2006
Opening expert reports due: 1. Ricoh's report(s) on infringement; 2. Ricoh's report(s) on damages; 3. Synopsys and the Customer Defendants' report(s) on invalidity; 4. Synopsys and the Customer Defendants' report(s) on unenforceability; and 5. Synopsys and the Customer Defendants' report(s) on other affirmative defenses, except that noninfringement and any damages related issues will be addressed in responsive reports	6/19/2006	6/19/2006
No non-emergency filings or communications between parties due to DSMO office move		6/30/06, 6:30 pm ET to 7/10/06, 9 am ET
Responsive expert reports due	7/19/2006	7/19/2006
Close of Expert discovery	8/18/2006	8/18/2006

Event	Date pursuant to existing order	New date
Dispositive motions due	8/18/2006	8/18/2006
Opposition briefs to Dispositive motions		9/01/2006
Reply briefs in support of Dispositive motions		9/08/2006
Dispositive Motion hearing	9/26/06 @ 9:30	9/26/06 @ 9:30
Mutual exchange of proposed jury instructions; deposition designations in electronic form; draft pre-trial statement.		10/2/2006
Mutual exchange of counter deposition designations in electronic form.		10/11/2006
Mutual exchange of objections to jury instructions; and objections to deposition designations and counter-designations in electronic form.		10/16/2006
Mutual exchange of proposed preliminary statements / instructions and proposed separate jury instructions; witness lists, exhibit lists		10/18/2006
Meet and confer regarding jury instructions; pretrial statement; and deposition designations.		10/20/2006
File Pre-Trial Statement, including witness lists, exhibit lists, and deposition designations; File Joint Set of Agreed Proposed Jury Instructions.	6/21/2006	10/25/2006
Mutual exchange of objections to witness lists, exhibit lists, and separate jury instructions. File motions in limine.		10/25/2006
Meet and Confer regarding proposed trial exhibits and other evidence, separate jury instructions, proposed preliminary instructions		10/27/2006
File List of Exhibits and Deposition Designations w/ Stipulations And Objections to Evidence; Proposed Voir Dire and Verdict Forms; Objections to Proposed Separate Jury Instructions	6/27/2006	10/30/2006
File Oppositions to Motions In Limine		11/6/2006
Submissions Of Copies Of Exhibits To Court	7/17/2006	11/13/2006
Pre-trial Conference	11/14/06 @ 3:30	11/14/06 @ 3:30
Submission Of Joint Preliminary Statements/Instructions	7/17/2006	11/20/2006
Trial	11/27-12/15/06	11/27-12/15/06

The Parties request that the Court modify its Second Amended Pre-trial order to adopt the dates set forth above.

1 Dated: June 8, 2006

DICKSTEIN SHAPIRO MORIN & OSHINSKY

2

3 By: /s/ Kenneth W. Brothers

4 Gary M. Hoffman

5 Kenneth W. Brothers

6 Attorneys for Ricoh Company, Ltd.

Dated: June 8, 2006

7 HOWREY, LLP

8

9 By: /s/ Denise De Mory

10 Teresa M. Corbin

Denise De Mory

11 Attorneys for Defendants and Synopsys

12 SO ORDERED:

13

14 By: 

15 United States Magistrate Judge

16 Dated: June 13, 2006